

MERLIN

LAW GROUP

125 HALF MILE ROAD, SUITE 200
RED BANK, NEW JERSEY 07701
DANIEL W. BALLARD

TELEPHONE (732) 933-2700
FACSIMILE (732) 933-2702
DBALLARDI@MERLINLAWGROUP.COM

March 2, 2021

Via Email

Chief Magistrate Judge Mark Falk
United State District Court
District of New Jersey
USPO & Courthouse
1 Federal Square, Room 457
Newark, NJ 07101

SO ORDERED

MARK FALK, U.S.M.J.

3/3/21

Re: C.S.J. Limited Liability Co. v. AmGUARD Insurance Company
Civil Action No. 2:20-cv-08253-JMV-MF

Dear Magistrate Judge Falk:

We write on behalf of Plaintiff, C.S.J. Limited Liability Co. and Defendant, AmGuard Insurance Company, in the above captioned matter and hereby request a two (2) week extension to the discovery dispute deadline set for March 2, 2021, and a ninety (90) day extension for the discovery deadline set for April 2, 2021, in your Order dated October 6, 2020 (D.E. 10).

The parties respectfully requests that the Court extend the discovery deadline regarding discovery disputes for two (2) weeks to March 16, 2021 and the discovery deadline ninety (90) days to July 1, 2021.

Respectfully Submitted,

/s/ Daniel Ballard

Daniel Ballard

JD/DB

cc: Jeremiah L. O'Leary, Esq (via email)
Frank G. Molfetta, Esq. (via email)
Javier Delgado (admitted Pro Hac Vice for Plaintiff)